UNITED STATES DISTRICT COURT EASTERN DISTRICT OF MICHIGAN SOUTHERN DIVISION

NANOGRAFIX CORPORATION,

Plaintiff,

Case No. 5:19-cv-10624-JEL-EAS

v.

Honorable Judge Judith E. Levy Mag. Judge Elizabeth A. Stafford

POLLARD BANKNOTE LIMITED

Defendant.

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AGREED ORDER

Plaintiff Nanografix Corporation ("Nanografix") and Defendant Pollard Banknote Limited ("Pollard") (collectively, the "Parties") hereby submit this proposed Agreed Order to memorialize the Court's rulings at the September 30, 2020 Status Conference, as follows:

- 1. With the exception set forth in Paragraph 2 below, all discovery is stayed until the issuance of the Court's claim construction decision. The stay shall expire upon the issuance of the Court's claim construction decision.
- 2. On or before November 4, 2020, Pollard shall "disclose information sufficient to show any accused products' relevant structure and composition" (per DN 22) for fifty tickets identified in Exhibit A to Nanografix's August 24, 2020 letter to Pollard selected by Nanografix. Nanografix has agreed to provide its list of such tickets on or before October 5, 2020.
- 3. The Parties reserve all rights and positions with respect to all discovery disputes, including their dispute over the sufficiency of such disclosures by Pollard to date and any future disputes regarding the production of materials pursuant to Paragraph 2 above.
- 4. For any non-dispositive disputes, including any discovery disputes, a party shall send an email to the Court's case manager, with a copy to the other party,

stating only that "the parties have a [non-dispositive or discovery] dispute(s)" that one or both parties wish to raise with the Court.

Dated: October 2, 2020

Respectfully submitted,

/s/ John G. Bisbikis

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SO ORDERED.

Date: October 5, 2020

<u>s/Judith E. Levy</u>United States District Judge